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June 30, 2006

BY OVERNIGHT DELIVERY AND E-FILE

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: Bay State Gas Company, D.T.E. 06-31

Dear Ms. Cottrell:

Enclosed for filing, on behalf of Bay State Gas Company ("Bay State"), please find Bay State's responses to the following Information Requests:

From the USW:

USW-1-4	USW-1-5	USW-1-6	USW-1-7	USW-1-8
USW-1-9	USW-1-10	USW-1-11	USW-1-12	USW-1-15
USW-1-16	USW-1-17	USW-1-18	USW-1-19	USW-1-20
USW-1-21	USW-1-22 CONFIDENTIAL			USW-1-24
USW-1-26 CONFIDENTIAL			USW-1-27	USW-1-28
USW-1-29	USW-1-32	USW-1-33	USW-1-34	

Please do not hesitate to telephone me with any questions whatsoever.

Very truly yours,

Patricia M. French

cc: Paul Osborne (DTE)
A. John Sullivan (DTE)
Alexander Cochis, Assistant Attorney General (4 copies)
Charles Harak, Esq. (UWUA)
Nicole Horberg Decter, Esq. (USW)
John K. Habib, Esq. (NSTAR)
James Avery, Esq. (Berkshire Gas Company)

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
FIRST SET OF INFORMATION REQUESTS FROM THE USW
D.T.E. 06-31

Date: June 30, 2006

Responsible: Stephen H. Bryant, President
As to Objection: Legal Counsel

USW 1-4: From December 1, 1999 to date, identify every NiSource affiliate within which "customer facing" functions and/or human resources functions have been outsourced to an external vendor other than IBM and its second-tier vendors. Additionally, identify the vendor, the functions outsourced to the vendor, the length of the outsourcing agreement between NiSource (, NCSC, or the affiliate) and the vendor.

RESPONSE: Objection. The question is irrelevant to this proceeding where Bay State's service quality on behalf of its customers and where the relationship between the jurisdictional company, Bay State, and its Parent, NiSource, is in issue. Moreover, the question is a fishing expedition into the affairs of non-jurisdictional companies since it requests information belonging to entities that have no demonstrated effect on Bay State service to its customers. Finally, the question is burdensome as hundreds of internal activities have been transferred to third party providers, as described below. Third party provision of services Bay State could provide itself is a normal, reasonable, cost-efficient method of obtaining and providing services it could do itself and it is part of Bay State's regular business practice.

Notwithstanding this objection, but rather specifically maintaining it, Mr. Bryant would state that there are two primary areas that have "customer facing" functions -- Meter to Cash and Customer Contact Centers -- that have outsourced business processes to other vendors.

In the Meter to Cash area, NCSC has agreements with the following companies to provide outsourced collections activities: NCO Financial Systems, United Collection Bureau, Alliance One, Trustmark, Argent, Corporate Collection Services, Credit Bureau of Columbus, and Capital Recovery. NCO Financial Systems, United Collection Bureau and Alliance One provide services to Bay State Gas and Northern Utilities as outside collection agencies. NCO Financial Systems also provides outbound collection calls to customers of Bay State Gas. Each of the companies listed above provide these same services to all the NCSC affiliates.

Each of the suppliers listed above for Meter to Cash have agreements with NCSC that do not have a specific termination date. NCSC has the ability to terminate these agreements with 30-day notice. The start date for each of these outsourcing agreements is as follows: The following agreements each had an effective date of April 15, 2004: NCO Financial Systems, United Collection Bureau, Argent, Trustmark and Alliance One. The following agreements each had an effective date of August 6, 2004: Credit Bureau of Columbus, Corporate Collection Services and Capital Recovery.

The second "customer facing" area is the Customer Contact Center, which has an outsourcing agreement with NCO Financial Systems. NCO handles overflow calls during high call volume times in the Contact Centers. NCO also provides inbound telephone notification and collection calls to active and inactive delinquent customers.

NCO was selected as an outsourcing supplier in September 2003. Prior to this selection, NCSC utilized Outsourcing Solutions, Inc., as a service provider. Outsourcing Solutions, Inc., did not provide services to the Customer Contact Centers after November 2003.

The outsourcing agreement with NCO for the Contact Centers ended on May 31, 2005, and was extended on a month-to-month basis.

A more extensive list of suppliers, including those identified above, that are utilized by NCSC to provide "customer facing" and/or human resource-related outsourced business services is provided in Attachment USW 1-4.

Table Attachment USWA 01-04

Miscellaneous Outsourced Work	Name of Supplier
Temporary labor	Adecco
Staffing & Selection Assessment	DDI
Background Checks	HR Plus
Benefits Admin - Miscellaneous Routine Communications	Hewitt Associates
Benefits Admin – Brown Bridgeman Deferred Comp	Hewitt Associates Brown Bridgeman
Drug Testing - Co 12	Choice Point
Competency Dictionary - License estimate	DDI
Employee Selection Process-Staffing Assessments	DDI
DDI Customer Service	DDI
Developmental 360 - LEAD	DDI
Edison Elec. Institute (NIPSCO, BU Testing Materials)	Edison Electric Institute
Employee Survey	DDI
Executive 360 Evaluation	HumanR
Facilitation Skills Workshop	Grainger
401k Administration	Fidelity
Stock Option Admin.	Fidelity
Affirmative Action	FW Consultants
Actuarial	Hewitt Associates
Compensation Consulting	Hewitt Associates
Health Care Consulting	Hewitt Associates
Ongoing H&W Recordkeeping	Hewitt Associates
QDRO	Hewitt Associates
Service/Retirement Awards	Lester Lampert Corporation
Recruiting/Hiring	Adecco
Pay by phone	Princeton e-com
Outbound Collections	NCO
Outside Collection Agency and Skip Tracing	Alliance One
Outside collection agency - final accts	United Collection Bureau
Outside collection agency - final accts	Trustmark
POSID and credit scoring	Equifax

Miscellaneous Outsourced Work	Name of Supplier
Utility theft investigations	ISM Security
Commercial & Industrial Credit Scoring	D&B
Outside collection agency - final accts	Argent Healthcare
Outside collection agency - final accts	CBCS
Outside collection agency - final accts	Collection Service Corp
Outside collection agency - final accts	Corporate Collection
Legal based collection work	Davis Davis
Legal based collection work	Bricker and Eckler
Legal based collection work	Griffith McCague
Legacy Outside Collection Agency	Credit Plus Solution
Legacy Outside Collection Agency	Diversified Receivables
Legacy Outside Collection Agency	Merchants Retail Assoc
Legacy Outside Collection Agency	Credit Bureau of South Bend
Legacy Outside Collection Agency	Helvey and Assoc (Legacy
Utility theft investigations	Pinkerton Theft Investigators
Electronic Changes of Address	USPS
Credit / Collections Calls (OH, PA, KY CCCs only)	NCO
New employee hiring process	Manpower
Interpreter Service	Network Omni
Call Recording	NICE
Schedule/Vacation Bid Tool	Eresource
Automated Call Back	Virtual Hold

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-5: Identify every BSG and/or NiSource employee responsible for the decision to freeze hiring at BSG in December 2001. Provide each individual's job title when the decision was made, his current position, his employer, and whether each employee received his salary from Bay State, NiSource, or another NiSource affiliate in 2001.

RESPONSE: Mr. Bryant is aware of no decision to "freeze" hiring in December 2001. However, he is aware of a decision at that time to require additional approvals before vacant positions could be filled.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-6: Provide all documents regarding, relating to, or informing the decision-makers identified in your response to USW 1-5 to institute a hiring freeze hiring at BSG in 2001.

RESPONSE: Please see Bay State's response to USW 1-5.

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DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-7: State the grounds for the decision to institute a hiring freeze at Bay State Gas in 2001.

RESPONSE: Please see Bay State's response to USW 1-5.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-8: Provide the date that the hiring freeze, initiated in 2001, was officially lifted at BSG.

RESPONSE: Please see Bay State's response to USW 1-5.

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RESPONSE OF BAY STATE GAS COMPANY TO THE
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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-9: Identify every Bay State Gas and NiSource employee responsible for the decision to lift the hiring freeze at Bay State Gas on the date identified in your response to USW 1-8. Provide each individual's job title at that time, his employer, and as whether the employee received his salary from Bay State, NiSource, or another NiSource affiliate in 2001.

RESPONSE: Please see Bay State's response to USW 1-5.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-10: Provide all documents regarding, relating to, or informing decision to lift the hiring freeze at BSG on the date specified in your response to USW 1-8.

RESPONSE: Please see Bay State's response to USW 1-5.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-11: For January 1, 2003 to date, identify every BSG and NiSource employee or agent with authority to determine when BSG should pursue a consumer rate increase with the Department of Telecommunications and Energy, e.g., DTE -5-27.

RESPONSE: NiSource, Inc. has no employees. Throughout the referenced time period, Mr. Bryant, as the Vice President of External Affairs and then the President of Bay State, is and has been responsible for determining whether the factors are appropriate for Bay State to pursue base rate relief.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-12: Provide the date the individuals identified in your response to USW 1-11, decided to pursue the rate increase which gave rise to DTE 05-27.

RESPONSE: No precise date was documented by Mr. Bryant.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-15: Provide the date that IBM Global Solutions ("IBM") was selected as a vendor, culminating in the June 2005 agreement between NCSC and IBM.

RESPONSE: IBM was selected as NCSC's business process and support services provider on April 25, 2005, after a down select process was finalized. An announcement was made publicly on April 28, 2005.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-16: Identify all BSG, NCSC, and/or NiSource employees tasked with evaluating the June 2005 Agreement between IBM and NiSource before and after June 21, 2005 to determine whether BSG should utilize IBM and its second-tier vendor, Vertek, for customer service, billing, sales, and other functions. Provide each individual's job title, his employer, and whether he received his salary from BSG, NiSource, another NiSource affiliate, or another source.

RESPONSE: NiSource has no employees. Employees of NCSC and Bay State were tasked with evaluating the June 2005 Agreement before and after June 2005 to determine whether NCSC should utilize IBM for customer service, billing, sales and other functions.

These employees are identified in Table USW 1-16 (a), below.

TABLE USW 1-16 (a)

Employee Name	Title	Employer
Violet Sistovaris	Senior Vice President, Administrative Services	NCSC
Kathleen O'Leary	Senior Vice President, Energy Distribution and Regulated Revenue	NCSC
Stephen Bryant	President, Bay State Gas	Bay State
Mike Davidson	Director, Customer Contact Centers	NCSC
Chuck Shafer	Vice President, Meter-to-Cash	NCSC
Bill Vagenas	Service Performance Manager	NCSC
Ron Uzubell	Service Performance Manager	NCSC
Brad Bohrer	Manager, Revenue Transactions	NCSC
Julie McElmurry	Lead, Program Management Office	NCSC

The NiSource Executive Council evaluated these decisions. The members of the Executive Council (excluding legal counsel) at the time the decision was made to enter into the Agreement with IBM are set forth in Table USW 1-16(b), below.

Table USW 1-16(b)

Employee Name	Title	Employer
Robert C. Skaggs, Jr.	President and Chief Executive Officer, NiSource	NCSC
Larry Francisco	Vice President, Audit	NCSC
LaNette Zimmerman	Senior Vice President, Human Resources and Communications	NCSC
Michael O'Donnell	Executive Vice President and Chief Financial Officer	NCSC
Gary Neale	Chairman of the Board of Directors	NCSC

The Executive Council then recommended the approval of the Agreement between IBM and NiSource to the NiSource Board of Directors.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-17: Identify all BSG and NiSource employees with decision-making authority over whether BSG should utilize IBM and its second-tier vendors for customer service, billing, sales, and other customer facing functions under the June 2005 IBM-NCSC Agreement. Provide each individual's job title, his employer, and whether each employee received his salary from BSG, NiSource, another NiSource affiliate, or another source.

RESPONSE: NiSource has no employees. Set forth in Table USW 1-17, below, is a list of Bay State and NCSC employees with decision-making authority over whether Bay State should utilize IBM and its Key Approved Contractor(s) for customer service, billing, sales and other customer facing functions under the June 2005 IBM-NiSource Agreement. With the exception of Mr. Bryant, who is the President of Bay State, all of the individuals listed in Table USW 1-17 (omitting legal counsel) are members of NiSource's Executive Council.

TABLE USW 1-17

Employee Name	Title	Employer
Robert C. Skaggs, Jr.	President and Chief Executive Officer, NiSource	NCSC
Stephen Bryant	President, Regulatory Affairs, Bay State Gas	BSG
Michael O'Donnell	Executive Vice President and Chief Financial Officer	NCSC
Rob Campbell	Executive Vice President, Human Resources and Communications	NCSC
Larry Francisco	Vice President, Audit	NCSC
Violet Sistovaris	Senior Vice President, Administrative Services	NCSC
Kathleen O'Leary	Senior Vice President, Energy Distribution and Regulated Revenue	NCSC
Harris Marple	Senior Vice President, Distribution Operations	NCSC
Jerry Godwin	Senior Vice President, NI Generation & Transmission	NCSC
Christopher Helms	President, Pipeline Group	NCSC
Glenn Kettering	Senior Vice President, Corporate Affairs	NCSC

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-18: From January 1, 2005 to date, provide all documents within the possession, custody or control of NiSource, NCSC, and/or BSG consulted in or informing the decision to outsource BSG's "customer facing", human resources, and information technology functions under the June 2005 IBM-NiSource Agreement.

RESPONSE: Bay State has not made a decision to outsource its "customer facing" functions for the Customer Contact Center. Bay State has a proposal from IBM to provide "customer-facing" services at Bay State's Customer Contact Center. The Company has expressed its commitment to negotiate with the relevant unions over the decision to outsource customer contact, credit & collections and billing exceptions work of bargaining unit employees.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President
As to Objection: Legal Counsel

USW 1-19: To the extent not provided as part of your response to USW 1-18, provide all documents within the control of NiSource, NCSC, and/or BSG relating to or regarding IBM's performance administering call centers under agreements with other companies.

RESPONSE: Objection. The question is irrelevant to this proceeding where Bay State's service quality on behalf of its customers and where the relationship between the jurisdictional company, Bay State, and its Parent, NiSource, is in issue. Moreover, the question is a fishing expedition into the affairs of non-jurisdictional companies since it requests information belonging to entities that have no demonstrated effect on Bay State service to its customers.

Notwithstanding this objection, but rather specifically maintaining it, NiSource, NCSC nor BSG have any documents relating to IBM's performance administering call centers under agreements with other companies. During the RFP process, IBM presented information about its global resource call centers. For the Smithfield Contact Center, IBM's proposal was to sub-contract the center to Vertex, a well-known utility call center organization.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President
As to Objection: Legal Counsel

USW 1-20: From July 1, 2005 to date, provide all documents, including, but not limited to internal memoranda, reports, and analyses, relating to or regarding IBM's performance of information technology services for BSG under the June 2005 NCSC-IBM Agreement.

RESPONSE: Objection. The question is irrelevant to this proceeding where Bay State's service quality on behalf of its customers and where the relationship between the jurisdictional company, Bay State, and its Parent, NiSource, is in issue. How Bay State addresses non-core IT issues with any outsourced entity is irrelevant to customer service under G.L. c. 164, sec. 1E.

Notwithstanding this objection, but rather specifically maintaining it, neither NCSC nor Bay State have any documents, internal memoranda, reports or analyses regarding IBM's performance of Information Technology services specific to Bay State. In the regular course of business, NCSC has reports and other documentation related to the performance of IT services tracking normal operating activities across the organization. These reports are general to NCSC and the reports provide an overview of all the IT services provided across the entire NCSC enterprise.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President
As to Objection: Legal Counsel

USW 1-21: From July 1, 2005 to date, identify each NiSource affiliate whose call center functions have been consolidated into the Smithfield, Pennsylvania call center owned by Columbia Gas and administered by IBM and its second tier vendor, Vertek.

RESPONSE:

Objection. The question is irrelevant to this proceeding where Bay State's service quality on behalf of its customers and where the relationship between the jurisdictional company, Bay State, and its Parent, NiSource, is in issue. Moreover, the question is a fishing expedition into the affairs of non-jurisdictional companies since it requests information belonging to entities that have no demonstrated effect on Bay State service to its customers.

Notwithstanding this objection, but rather specifically maintaining it, NiSource affiliates Columbia Gas of Kentucky, Inc. (CKY) and Columbia Gas of Ohio, Inc. (COH) have shared call center functions physically located in Smithfield, Pennsylvania, in a facility leased for that purpose. The call center activities undertaken on behalf of CKY and COH are governed by the terms of the IBM agreement and are coordinated on-site by IBM's Key Approved Subcontractor (KAC), Vertex.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President
As to Objection: Legal Counsel

USW 1-22: From July 1, 2005 to date, provide all documents within the custody, possession, or control of BSG, NCSC, or NiSource relating to or regarding the training of Smithfield, Pennsylvania Call Center facility workers responding to billing, service, and credit calls for NiSource affiliates.

RESPONSE: Objection. The question is irrelevant to this proceeding where Bay State's service quality on behalf of its customers and where the relationship between the jurisdictional company, Bay State, and its Parent, NiSource, is in issue. Moreover, the question is a fishing expedition into the affairs of non-jurisdictional companies since it requests information belonging to entities that have no demonstrated effect on Bay State service to its customers.

Notwithstanding this objection, but rather specifically maintaining it, the NCSC CCC training manual for all the Customer Contact Centers (Call Aid) is attached on CD disk as Attachment USW 1-22 and 1-26 CONFIDENTIAL. Attachment USW 1-22 and 1-26 is claimed by Bay State as confidential because it constitutes a trade secret and competitive business secret to IBM and because NCSC has warranted to maintain the confidentiality of this material. Accordingly, the material is provided in single copy to the Hearing Officer under a Motion for Protective Treatment and will be provided to any other party upon execution of a mutually-agreeable confidentiality agreement.

Attachment USW 1-22 and 1-26 CONFIDENTIAL includes all documents related to training for the Smithfield, Pennsylvania Call Center facility. Employees also use this electronic manual or Call Aid as the operational manual for the Customer Contact Centers.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President
As to Objection: Legal Counsel

USW 1-24: Prior to July 1, 2005, how many individuals were employed by Columbia Gas to staff its call center(s)? How many individuals does IBM currently use to staff customer service for Columbia Gas customers?

RESPONSE: Objection. The question is irrelevant to this proceeding where Bay State's service quality on behalf of its customers and where the relationship between the jurisdictional company, Bay State, and its Parent, NiSource, is in issue. Moreover, the question is a fishing expedition into the affairs of non-jurisdictional companies since it requests information belonging to entities that have no demonstrated effect on Bay State service to its customers.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-26: Provide all training materials currently utilized by BSG to train Springfield Call Center universal service representatives to perform service, billing, and credit calls for BSG customers.

RESPONSE: Please see Bay State's response to USW 1-22.

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-27: Identify all NiSource and/or NCSC employees charged with addressing deficiencies in service quality (in the performance of service, credit, billing, and collections functions, payroll functions, and information technology functions) with IBM and/or its second tier vendors pursuant to the June 2005 IBM-NiSource Agreement. Provide each individual's job title, as well as whether each employee received his salary from NiSource or another NiSource affiliate.

RESPONSE: Bay State does not interpret the phrase "service quality" as the question infers. Payroll and IT are non-core and are not "service quality" functions measured by any state regulatory commission of which Bay State is aware. Moreover, NiSource has no employees.

With regard to NCSC, Table USW-1-27, below, provides a list of the primary NCSC employees (excluding legal counsel) charged with addressing service quality issues of interest to state regulatory commissions in the context of the IBM business processes transformation.

TABLE USW-1-27

Employee Name	Title	Employer
Violet Sistovaris	Senior Vice President, Administrative Services	NCSC
Sherry Gavito	Vice President, Governance	NCSC
Mike Davidson	Director, Customer Contact Centers	NCSC
Chuck Shafer	Vice President, Meter to Cash	NCSC
Don Sievert	Service Quality, Lead	NCSC
Ron Uzubell	Service Performance Manager	NCSC
Bill Vagenas	Service Performance Manager	NCSC
Andy Otis	Service Quality Specialist	NCSC
Jackie Miller-Dunn	Contract and Compliance Specialist	NCSC

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President
As to Objection: Legal Counsel

USW 1-28: Identify all BSG employees charged with addressing deficiencies in service quality (in the performance of information technology and payroll functions) with IBM and/or its second-tier vendors pursuant to the June 2005 IBM-NiSource Agreement. Provide each individual's job title.

RESPONSE: Objection. The question is irrelevant to this proceeding where Bay State's service quality on behalf of its customers and where the relationship between the jurisdictional company, Bay State, and its Parent, NiSource, is in issue. How Bay State addresses non-core IT and payroll issues with any outsourced entity is irrelevant to customer service under G.L. c. 164, sec. 1E.

Notwithstanding this objection, but rather specifically maintaining it, the following individual listed in Table USW 1-28, below, is the BSG employee charged with addressing any deficiencies in service quality with IBM.

TABLE USW-1-28

Name	Position or Title
Stephen H. Bryant	President, Bay State Gas Company

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Date: June 30, 2006

Responsible: Stephen H. Bryant, President
As to Objection: Legal Counsel

USW 1-29: From December 1999 to date, provide all documents in the possession, custody or control of BSG, NCSC, or NiSource, including but not limited to, internal memoranda, reports, e-mails, meeting notes, regarding or relating to Springfield Call Center's failure to meet Massachusetts, New Hampshire, or Maine customer service quality indicators (from time to time between 1999 and the present date). This request includes, but is not limited to, documents regarding or relating to strategies set forth by BSG, its agents, or employees to improve service quality and/or to increase staffing levels.

RESPONSE: Objection. The request constitutes a fishing expedition. Materials dating to 1999 are completely irrelevant to this inquiry that takes place in 2006, when Bay State has met its call center service quality metrics for over three years. Bay State has met or exceeded its call center metrics in each of the years 2003, 2004 and 2005. The request is not calculated to lead to evidence that will be admissible as to any material issue in this proceeding.

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Responsible: Stephen H. Bryant, President
As to Objection: Legal Counsel

USW 1-32: For each year beginning January 1, 1999 to the present date, provide the number of trunk lines that BSG utilized to take customer service, billing, and credit calls at its Springfield Call Center.

RESPONSE: Objection. The request constitutes a fishing expedition. Materials dating to 1999 are completely irrelevant to this inquiry that takes place in 2006, when Bay State has met its call center service quality metrics for over three years. Bay State has met or exceeded its call center metrics in each of the years 2003, 2004 and 2005. The request is not calculated to lead to evidence that will be admissible as to any material issue in this proceeding.

Notwithstanding this objection, but rather specifically maintaining it, Bay State will state that it is gathering the information regarding trunk lines for the referenced activities for 2003 through 2006 and will supplement this information when the information has been compiled.

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Responsible: Stephen H. Bryant, President
As to Objection: Legal Counsel

USW 1-33: From December 1999 to date, provide all documents in the possession, custody, or control of NiSource, NCSC, or BSG regarding or relating to whether the number of trunk lines utilized by BSG's Springfield Call Center should be, or were, lowered, or conversely, increased.

RESPONSE: Objection. The request constitutes a fishing expedition. Materials dating to 1999 are completely irrelevant to this inquiry that takes place in 2006, when Bay State has met its call center service quality metrics for over three years. Bay State has met or exceeded its call center metrics in each of the years 2003, 2004 and 2005. The request is not calculated to lead to evidence that will be admissible as to any material issue in this proceeding.

Notwithstanding this objection but rather specifically maintaining it, Bay State will state that it is looking to determine whether any such documents exist from the years 2003, 2004, 2005 or 2006 and will supplement this response if any such material is found.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
FIRST SET OF INFORMATION REQUESTS FROM THE USW
D.T.E. 06-31

Date: June 30, 2006

Responsible: Stephen H. Bryant, President

USW 1-34: To the extent not provided in any of your previous responses, identify all NiSource employee(s) or agent(s) who are currently responsible for call center operations, staffing levels at NiSource affiliates' call centers, and/or administering the June 2005 NCSC-IBM Agreement with regard to customer service, billing, credit and collections, information technology, and human resources functions.

RESPONSE: Please see Bay State's response to UWUA-2-5.